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UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

Martin Ramirez Troche and
Maria Ramirez,

Debtors.

Case No.: 2:22-BK-13031-JB

**MOTION FOR 2004 EXAMINATION –
DEBTOR MARTIN RAMIREZ TROCHE**

Notice of No Hearing Served Pursuant to
LBR 9013-1(p)

Creditor Scott Dain, c/o Law Office of Anthony C. Duffy (“Creditor”) hereby requests an order approving a 2004 examination for debtor Martin Ramirez Troche.

Prior to the petition being filed, debtors Martin Ramirez Troche and Maria Ramirez (“Debtors”) operated businesses using a multitude of names and included their family members as directors or officers. Just before filing, Debtors were operating a restaurant in the same strip mall as another business purportedly owned and operated by their son, Ismael Ramirez. Creditors are informed and believe the two businesses comingle their assets.

To date, Creditor has independently investigated the financial affairs of Debtors and their family, and found the following business names operated by Debtors and relatives that are in various states of suspension, use, or partial use:

1. Mariscos La Fiesta Restaurant Inc., aka Mariscos La Fiesta Restaurant
2. The Falcon Inn Corporation

3. La Fiesta Meat Market Inc.
4. La Fiesta Meat Market
5. La Fiesta Restaurant Group Inc.
6. Big O Fish Brews and Grill
7. Restaurant Managing Group Inc
8. Al Chile Pelon Mexican Food
9. Al Chile Pelon Restaurants Inc.
10. Baja King Fish Tacos and Mariscos
11. El Milagro Restaurants Group Inc.
12. La Fiesta Bakery

Creditor also attempted to meet and confer regarding the scope of the examinations. In order to confirm his status as a fully secured creditor prior to plan confirmation, Creditor requires the following information:

1. All filed federal and state tax returns, with schedules and supporting documentation, for tax years 2010–2021
2. Account and wage transcripts from the Internal Revenue Service and Franchise Tax Board for tax years 2010–2021
3. Profit and loss and balance sheets for tax years 2017–current for Debtors and their various sole proprietorships and corporations
4. All bank statements for January 2017–current for Debtors and their business enterprises
5. Mortgage statements for 2017–current for Debtors’ real property at 4060 W 134th St., Hawthorne, CA 90250
6. All documents showing rental agreements and payments of rent for residents at Debtors’ real property at 4060 W 134th St., Hawthorne, CA 90250
7. All documents supporting Debtors’ valuation for the real property at 4060 W 134th St., Hawthorne, CA 90250

Pursuant to LBR 2004-1(a), Creditor attempted to meet and confer by email and call regarding the examinations. The first emails and call led to some productive discussions, but the

1 second call did not take place as scheduled. Griffin Decl. ¶¶ 3–7. Creditor has chosen dates for the
2 examinations well in excess of 21 days to accommodate everyone’s schedules and give time for the
3 examined individuals and entities to collect the requested documents, and will continue to meet and
4 confer on any disputes as required by LBR 2004-1(g).

5 On these grounds, Creditor requests an order as follows:

- 6 1. The Court enter an order allowing for the examination of debtor Martin Ramirez
7 Troche and the documents requested; and
- 8 2. Any other and further relief the Court deems necessary or proper.

9 Dated: September 4, 2022

10
11 /s/ Daniel Griffin
12 Daniel Griffin
13 Attorney for Creditor
14 Scott Dain
15 c/o Law Offices of Anthony C. Duffy